

**From:** "Michael Cranmer" <michael.cranmer@compassbank.com> on 03/22/2006 05:05:02 PM

**Subject:** Interagency Concentrations in Commercial Real Estate Lending

Michael Cranmer  
Pensacola, FL 32503-2516

March 22, 2006

Jennifer Johnson

Dear Jennifer Johnson:

I have been a corporate banker for over 25 years. I believe any regulatory measures for banking must be at a local level or state level. IF regulators enforce nationwide conformity, they are cheating our good banks at the opportunity of using our capital and the talents of our bankers in our good markets just to protect the poor markets.

I urge sound banking, good oversight on credit decisions and adherence to policy and federal law. Always have. Always will. I have had perhaps five defaults in twenty five years.

Thus, I request that you not evoke some national or regional action or administration memo on real estate concentrations. Instead, each credit should be reviewed and measured in terms of equity, guarantees, trends in the market and more importantly, the ability and intent to repay the loan. These measures are important.

Any blanket law, regulation or administration letter will serve to weaken the ability of the bank, the market and the strength of our borrowers to meet the demand of the market. After all, supply and demand will solve this issue. A government agency can't shape supply and demand except to limit the ability of the market to meet the demand which is detrimental.

I thank you for your consideration of these concerns and comments and hope that the final Guidance will address them in a meaningful way

Sincerely,

Michael Cranmer